

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**SUPPRESSED**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	No.
vs.	)	
	)	
SUSAN HAMPE,	)	
	)	
Defendant.	)	

**INDICTMENT**

**Counts I and II (Mail Fraud)**

The Grand Jury charges that:

*Introduction*

1. Between August 2005 and July 2010, Susan Hampe, the defendant herein, worked as the office manager of a medical practice known as the Health Center (the "medical practice") with offices in St. Louis County within the Eastern District of Missouri. Among other things, the defendant's work duties included collecting payments due the medical practice from various insurance companies as well as payments made to the medical practice directly from its patients.

2. At some point unknown to the Grand Jury but by no later than May 1, 2008, the defendant devised a scheme to defraud the medical practice and certain insurance companies with which the medical practice did business.

*The Fraud Scheme*

3. It was part of the scheme to defraud that defendant embezzled payments due the

**SUPPRESSED**

medical practice, which were transmitted to the office of the medical practice by means of the United States Postal Service. Defendant would take insurance payments due the medical practice for serviced rendered to a patient insured by a health insurance plan, forge the signature of a member of the medical practice on the check, indicate the payee wished to sign the proceeds of the check over to Defendant and then deposit the check in a financial account Defendant controlled.

4. It was further part of the scheme to defraud that defendant created bogus claim applications in the name of the medical practice, submitted them to the health insurance plan associated with an existing patient, and signed the payment checks over to herself for deposit to financial accounts she controlled. The bogus applications were transmitted from the medical practice to the various health insurance plans by means of the United States Postal Service.

*Offense Conduct*

5. The allegations contained in paragraphs 1 through 5 are hereby realleged and incorporated by reference.

6. Between on or about May 1, 2008 and May 1, 2010 with the exact dates unknown, the defendant herein,

**SUSAN HAMPE,**

devised a scheme to defraud and to obtain money and other property from another by means of false and fraudulent pretenses, representations and promises and, in furtherance and execution thereof, sent and caused material to be delivered by the United States Postal Service.

Specifically, the defendant sent and caused to be delivered by the United States Postal Service

**SUPPRESSED**

applications for payments for services purported rendered by the medical practice to health insurance plans as follows:

Count	Date	Patient	Health Insurance Plan	Amount
I	January 25, 2010	M. H.	USAA	\$160.00
II	April 19, 2010	S. K.	United Healthcare	\$120.00

All in violation of Title 18, United States Code, Section 1341.

**Counts III and IV (Theft of Mail)**

7. The allegations contained in paragraphs 1 through 5 are hereby realleged and incorporated by reference.

8. Between on or about May 1, 2008 and August 1, 2010, with the exact dates unknown, the defendant,

**SUSAN HAMPE,**

stole things contained in mail material delivered to the medical practice, to wit: checks payable to the medical practice for services rendered to various patients as follows:

Count	Date	Payor	Amount	Check Number
III	January 19, 2010	Christian Brothers	\$155.00	705-647725
IV	April 1, 2010	USAA Casualty	\$1,879.86	45015250

All in violation of Title 18, United States Code Section 1708.

**FORFEITURE ALLEGATION**

The Grand Jury further finds probable cause that:

9. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United

**SUPPRESSED**

States Code, Section 1341 as set forth in Counts I and II, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said offense.

10. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

11. Specific property subject to forfeiture includes, but is not limited to, the following:

(a) A black 2003 Cadillac DeVille bearing Missouri license number YD8N6W and VIN 1G6KD54YX3U174796; and

(b) A single family residence described in the records of St. Louis County as Berkley Manor Plat 6 Lot 92; Pb 125 - page 20 and also known as 12144 Point Oak Road, Des Peres, St. Louis County, Missouri 63131.

12. If any of the property described above, as a result of any act or omission of the defendant,

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; and/or
- (e) has been commingled with other property that cannot be subdivided without difficulty;

**SUPPRESSED**

the United States of America will be entitled to the forfeiture of substitute property pursuant to  
Title 21, United States Code, Section 853(p).

A TRUE BILL.

---

FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

---

Thomas C. Albus, #96250  
Assistant United States Attorney